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May 18, 2018

Honorable Deborah C. Freeman  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Bal v. Manhattan Democratic Party, et al.***  
**Docket No. 16CV2416 (PKC)(DCF)**

Judge Freeman:

This letter is being sent as a reply to Plaintiff's letter of May 18, 2018 to the Court requesting additional discovery, and by this letter we oppose Plaintiff's request.

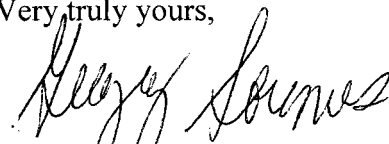
Defendants have complied with all Orders of the Court and all of Plaintiff's requests for discovery. Plaintiff has asked me on several occasions to comply with discovery, and on each occasion I've simply asked Plaintiff what information he might need. On each occasion Plaintiff has simply said that Defendants must comply fully.

The Court previously denied my timely application for additional discovery and Plaintiff is now asking for additional discovery after the April 30, 2018 date set by the Court as the discovery deadline.

Plaintiff has never stated that any particular issue has gone unaddressed. Also, Plaintiff deposed Defendants after all written discovery was exchanged and no questions were left unanswered after Plaintiff deposed Defendants.

Lastly, we ask the Court to set a motion schedule.

Very truly yours,



Gregory C. Soumas